

EXHIBIT A

Fill in this information to identify the case:

Debtor 1 William Steven Stanaitis

Debtor 2 Penny Mifflin Stanaitis
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of Pennsylvania

Case number 23-12187 PMM

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	<u>Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania</u> Name of the current creditor (the person or entity to be paid for this claim)	
	Other names the creditor used with the debtor _____	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? _____	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? <u>Citizens Bank, N.A.</u> Name <u>10561 Telegraph Road</u> Number Street <u>Glen Allen VA 23059</u> City State ZIP Code Contact phone <u>800-234-6002</u> Contact email <u>mary@javardianlaw.com</u> Uniform claim identifier for electronic payments in chapter 13 (if you use one): _____	Where should payments to the creditor be sent? (if different) <u>Citizens Bank, N.A.</u> Name <u>PO Box 2800</u> Number Street <u>Glen Allen VA 23059</u> City State ZIP Code Contact phone <u>800-234-6002</u> Contact email <u>mary@javardianlaw.com</u>
4. Does this claim amend one already filed?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes. Claim number on court claims registry (if known) <u>7</u> Filed on <u>01/22/2024</u> MM / DD / YYYY	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? _____	

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☐ No
☒ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 0 3 0 7

7. How much is the claim? \$ 70,046.43 Does this amount include interest or other charges?
☐ No
☒ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

9. Is all or part of the claim secured? ☐ No
☒ Yes. The claim is secured by a lien on property.
Nature of property: 349 Mulberry Drive, Limerick, PA 19468
☒ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: mortgage
Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ 70,046.43
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ 31,348.16
Annual Interest Rate (when case was filed) 10.87 %
☐ Fixed
☒ Variable

10. Is this claim based on a lease? ☒ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? ☒ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Amount entitled to priority

\$ _____

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 03/18/2024
MM / DD / YYYY

/s/ Mary F. Kennedy

Signature

Print the name of the person who is completing and signing this claim:

Name Mary F. Kennedy

First name

Middle name

Last name

Title

attorney for Citizens Bank, N.A. s/b/m to Citizens Bank of Pennsylvania

Company

Law Office of Gregory Javardian, LLC

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

1310 Industrial Blvd., Ste 101

Number

Street

Southampton

PA

18966

City

State

ZIP Code

Contact phone

215-942-9690

Email mary@javardianlaw.com

Mortgage Proof of Claim Attachment

(12/15)

If you file a claim secured by a security interest in the debtor's principal residence, you must use this form as an attachment to your proof of claim. See separate instructions.

Part 1: Mortgage and Case Information		Part 2: Total Debt Calculation		Part 3: Arrearage as of Date of the Petition		Part 4: Monthly Mortgage Payment	
Case number:	23-12187 PMM	Principal balance:	\$48,818.08	Principal & interest due:	\$22,493.28	Principal & interest:	\$736.44
Debtor 1:	William Steven Stanaitis	Interest due:	\$12,373.47	Prepetition fees due:	\$8,854.88	Monthly escrow:	
Debtor 2:	Penny Mifflin Stanaitis	Fees, costs due:	\$8,854.88	Escrow deficiency for funds advanced:		Private mortgage insurance:	
Last 4 digits to identify:	0307	Escrow deficiency for funds advanced:		Projected escrow shortage:		Total monthly payment:	\$736.44
Creditor:	Citizens Bank, N.A.	Less total funds on hand: -		Less funds on hand: -			
Servicer:	Citizens Bank, N.A.	Total debt:	\$70,046.43	Total prepetition arrearage:	\$31,348.16		
Fixed accrual/daily simple interest/other:		daily simple					

Part 5 : Loan Payment History from First Date of Default

Account Activity						How Funds Were Applied/Amount Incurred						Balance After Amount Received or Incurred				
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.	L.	M.	N.	O.	P.	Q.
Date	Contractual payment amount	Funds received	Amount incurred	Description	Contractual due date	Prin, int & esc past due balance	Amount to principal	Amount to interest	Amount to escrow	Amount to fees or charges	Unapplied funds	Principal balance	Accrued interest balance	Escrow balance	Fees / Charges balance	Unapplied funds balance
8/28/19	336.67			Payment due		336.67						48,818.08				
9/28/19	336.67			Payment due		673.34						48,818.08				
10/28/19	315.78			Payment due		989.12						48,818.08				
11/2/19		315.78		Funds received	8/28/2019	652.45		315.78				48,818.08				
11/13/19			15.79	Late charge						-15.79					15.79	
11/28/19	315.94			Payment due		968.39						48,818.08				
12/14/19		332.40		Funds received	9/28/2019	631.72		332.40				48,818.08				
12/14/19			15.80	Late charge						-15.80					31.59	
12/21/19		316.00		Funds received	10/28/2019	315.94		316.00				48,818.08				
12/28/19	216.39			Payment due		532.33						48,818.08				
1/13/20			14.79	Late charge						-14.79					46.38	
1/28/20	59.82			Payment due		592.15						48,818.08				
2/13/20			15.28	Late charge						-15.28					61.66	
2/28/20	304.74			Payment due		896.89						48,818.08				
3/15/20			15.24	Late charge						-15.24					76.90	

Case number: _____

Debtor 1: _____

Part 5 : Loan Payment History from First Date of Default

Account Activity						How Funds Were Applied/Amount Incurred						Balance After Amount Received or Incurred				
A.	B.	C.	D.	E.	F.	G.	H.	I.	J.	K.	L.	M.	N.	O.	P.	Q.
Date	Contractual payment amount	Funds received	Amount incurred	Description	Contractual due date	Prin, int & esc past due balance	Amount to principal	Amount to interest	Amount to escrow	Amount to fees or charges	Unapplied funds	Principal balance	Accrued interest balance	Escrow balance	Fees / Charges balance	Unapplied funds balance
3/28/20	285.07			Payment due		1,181.96						48,818.08				
4/13/20			14.25	Late charge						-14.25					91.15	
4/28/20	304.74			Payment due		1,486.70						48,818.08				
5/14/20			15.24	Late charge						-15.24					106.39	
5/26/20		315.94		Funds received	11/28/2019	1,170.76										
5/28/20	234.89			Payment due		1,405.65						48,818.08				
6/13/20			11.74	Late charge						-11.74					118.13	
6/25/20		100.00		Funds received				100.00				48,818.08				
6/28/20	242.72			Payment due		1,648.37						48,818.08				
7/14/20		12.14		Late charge						-12.14					130.27	
7/28/20	234.88			Payment due		1,883.25						48,818.08				
8/28/20	242.72			Payment due		2,125.97						48,818.08				
9/3/20			15.00	Property inspection						-15.00					145.27	
9/28/20	242.72			Payment due		2,368.69						48,818.08				
10/5/20			15.00	Property inspection						-15.00					160.27	
10/28/20	242.72			Payment due		2,611.41						48,818.08				
11/9/20			15.00	Property inspection						-15.00					175.27	
11/12/20			12.14	Late charge						-12.14					187.41	
11/28/20	258.38			Payment due		2,869.79						48,818.08				
12/4/20			15.00	Property inspection						-15.00					202.41	
12/14/20			12.92	Late charge						-12.92					215.33	
12/28/20	234.89			Payment due		3,104.68						48,818.08				
1/4/21			15.00	Property inspection						-15.00					230.33	
1/12/21			11.74	Late charge						-11.74					242.07	
1/28/21	243.38			Payment due		3,348.06						48,818.08				

2/2/21			15.00	Property inspection								257.07	
2/12/21			12.17	Late charge					-12.17			269.24	
2/28/21	243.38			Payment due		3,591.44				48,818.08			
3/2/21			15.00	Property inspection					-15.00			284.24	
3/15/21			12.17	Late charge					-12.17			296.41	
3/28/21	219.83			Payment due		3,811.27				48,818.08			
4/5/21			15.00	Late charge					-15.00			311.41	
4/12/21			10.99	Late charge					-10.99			322.40	
4/28/21	227.68			Payment due		4,038.95				48,818.08			
5/6/21			15.00	Property inspection					-15.00			337.40	
5/13/21			11.38	Late charge					-11.38			348.78	
5/28/21	251.23			Payment due		4,290.18				48,818.08			
6/7/21			15.00	Property inspection					-15.00			363.78	
6/14/21			12.56	Late charge					-12.56			376.34	
6/15/21		232.18		Funds received	12/28/2019	4,073.79		216.39	15.79	48,818.08		360.55	
6/28/21	243.38			Payment due		4,317.17				48,818.08			
7/28/21	491.03			Payment due		4,808.20				48,818.08			
8/28/21	530.30			Payment due		5,338.50				48,818.08			
9/28/21	506.74			Payment due		5,845.24				48,818.08			
10/15/21		250.00		Funds received				250.00		48,818.08			
10/28/21	514.59			Payment due		6,359.83				48,818.08			
11/28/21	514.59			Payment due		6,874.42				48,818.08			
12/28/21	498.89			Payment due		7,373.31				48,818.08			
1/28/22	522.44			Payment due		7,895.75				48,818.08			
2/28/22	514.59			Payment due		8,410.34				48,818.08			
3/28/22	491.04			Payment due		8,901.38				48,818.08			
4/28/22	514.59			Payment due		9,415.97				48,818.08			
5/28/22	516.77			Payment due		9,932.74				48,818.08			
6/28/22	516.77			Payment due		10,449.51				48,818.08			
7/28/22	519.13			Payment due		10,968.64				48,818.08			
8/28/22	606.36			Payment due		11,575.00				48,818.08			
9/28/22	586.16			Payment due		12,161.16				48,818.08			
9/30/22			20.00	Property inspection					-20.00			380.55	
10/28/22	618.74			Payment due		12,779.90				48,818.08			
11/2/22			20.00	Property inspection					-20.00			400.55	

11/28/22	638.98			Payment due	13,418.88				48,818.08			
12/8/22			20.00	Property inspection				-20.00				420.55
12/23/22			95.00	Title search				-95.00				515.55
12/28/22	603.39			Payment due	14,022.27				48,818.08			
1/10/23			20.00	Property inspection				-20.00				535.55
1/28/23	695.81			Payment due	14,718.08				48,818.08			
2/6/23			20.00	Property inspection				-20.00				555.55
2/28/23	677.27			Payment due	15,395.35				48,818.08			
3/3/23			2070.00	Foreclosure attorney fee				-2070.00				2,625.55
3/3/23			298.70	Filing fee – Complaint				-298.70				2,924.25
3/3/23			124.00	Service – Complaint				-124.00				3,048.25
3/8/23			20.00	Property inspection				-20.00				3,068.25
3/15/23			20.00	Late charges				-20.00				3,088.25
3/27/23			3500.00	Sheriff's sale deposit				-3500.00				6,588.25
3/28/23	650.20			Payment due	16,045.55				48,818.08			
4/5/23			30.00	Property inspection				-30.00				6,618.25
4/12/23			20.00	Late charge				-20.00				6,638.25
4/28/23	715.04			Payment due	16,760.59				48,818.08			
5/9/23			30.00	Property inspection				-30.00				6,668.25
5/15/23			20.00	Late charge				-20.00				6,688.25
5/28/23	697.33			Payment due	17,457.92				48,818.08			
6/5/23			30.00	Property inspection				-30.00				6,718.25
6/12/23			20.00	Late charge				-20.00				6,738.25
6/13/23			50.00	Title search				-50.00				6,788.25
6/28/23	683.13			Payment due	18,141.05				48,818.08			
7/5/23			30.00	Property inspection				-30.00				6,818.25
7/13/23			455.00	Appraisal				-455.00				7,273.25
7/13/23			20.00	Late charge				-20.00				7,293.25
7/24/23			1035.00	Foreclosure attorney fee				-1035.00				8,328.25
7/24/23			49.75	Filing costs – judgment/writ				-49.75				8,378.00
7/24/23			28.68	Lien holder notices				-28.68				8,406.68
7/24/23			150.00	Tax Certification				-150.00				8,556.68
7/28/23	721.90			Payment due	18,862.95				48,818.08			
12/27/23			-950.80	Sheriff's sale refund				950.80				7,605.88
3/13/24			4879.33	Post-petition arrears per Stipulation	22,493.28			-1249.00	48,818.08			8,854.88